FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 1-800-451-6027

Owens Corning 128 W. Eighth Street Brookville, Indiana 47012

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

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Operation Permit No.: F047-5160-00005				
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 22, 1997			
First Administrative Amendment: AAF047-9594	Pages Affected: 7,27, 28, 29, 31, 32, 33, 34, 37 and 38			
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 22, 1998			
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Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:			

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SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates an Asphalt Felt, Coatings, and Roofing Products production plant.

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Responsible Official: Martin D. Bever

Source Address: 128 W. Eighth Street, Brookville, Indiana, 47012 Mailing Address: 128 W. Eighth Street, Brookville, Indiana, 47012

SIC Code: 2952

County Location: Franklin County

County Status: Attainment for all criteria pollutants. Source Status: Minor Source, PSD Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- (a) four (4) combustion emission units (EU) consisting of:
 - one (1) natural gas fired asphalt preheater #1 identified as EU 1.1, rated at 2.5 million British thermal units per hour and using No.2 fuel oil as a backup, exhausting at one (1) stack identified as 65;
 - one (1) natural gas fired asphalt preheater #2 (asphalt saturant preheater) identified as EU 1.2, rated at 1.5 million British thermal units per hour and using No.2 fuel oil as a backup, exhausting at one (1) stack identified as 66;
 - one (1) natural gas fired filler heater (asphalt saturant preheater) identified as EU 1.3, rated at 2.5 million British thermal units per hour and using No.2 fuel oil as a backup, exhausting at one (1) stack identified as 15; and
 - (4) one (1) natural gas fired hot oil heater identified as EU 1.4, rated at 2.1 million British thermal units per hour and using No. 2 fuel oil as a backup, exhausting at one (1) stack identified as 67;
- (b) three (3) storage tanks consisting of:
 - (1) one (1) 40,000 gallon capacity asphalt tank #1 rated at 200 gallons per minute and identified as EU 2.1, with a fiber filter bed to control particulate matter, exhausting at one (1) stack identified as 71;
 - one (1) 10,000 gallon capacity adhesive tank #7, currently out of service to be placed back in service, rated at 200 gallons per minute and identified as EU 2.2, with particulate matter to be controlled by fiber bed filter and exhausting to one (1) unlabeled stack; and
 - one (1) 10,000 gallon capacity adhesive tank #7A, to be built, rated at 200 gallons per minute and identified as EU 2.3, with particulate matter to be controlled by fiber bed filter and exhausting to one (1) unlabeled stack;
- (c) one (1) 30,000 gallon capacity asphalt tank #2 rated at 200 gallons per minute and identified as EU 3.1, exhausting at one (1) stack identified as 72;

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(d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:

one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, utilizing "Smartimers" for controlling cleaning cycle frequency, each exhausting at one (1) individual stack identified as 74 and 75:

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- one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 77:
- (3) one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 utilizing "Smartimers" for controlling cleaning cycle frequency, particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81;
- (4) one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79:
- one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A;
- one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, utilizing "Smartimers" for controlling cleaning cycle frequency, particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
- (7) one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C;
- (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse associated with the permitted mineral surfacing processes, exhausting at one (1) stack; and
- (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14.
- (e) one (1) asphalt filler mixer rated at 300 gallons per minute and identified as EU 5.1;
- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36;

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one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons granules and sand per day, exhausting through one stack identified as 71A;

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- (4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14;
- one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
- (6) fugitive emissions from ventilators, identified as ID# 93.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) one (1) parting agent recycle system rated at 27 thousand cubic feet per hour and identified as EU 4.6;
- (b) VOC emissions from pumps, valves, flanges, etc., identified as ID# 92;
- (c) fugitive emissions from material unloading, identified as ID# 94.
- (d) additional miscellaneous insignificant activities:
 - (1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. This includes one (1) 0.58 Million British thermal units per hour rated furnace, eleven (11) 0.075 Million British thermal units per hour individually rated furnaces, and one (1) 0.25 million British thermal units per hour rated boiler;
 - propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour;
 - (3) equipment powered by internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) British thermal units per hour;
 - (4) combustion source flame safety purging on startup;
 - (5) the following VOC and HAP storage containers:
 - (A) storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs less than twelve thousand (12,000) gallons;
 - (B) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (6) machining where an aqueous cutting coolant continuously floods the machining interface;
 - (7) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

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- (8) cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kilopascal; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100 °F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kilopascal; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 °C (68 °F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(9) the following equipment related to manufacturing activities not resulting in the emission of hazardous air pollutants (HAPs); brazing equipment, cutting torches, soldering equipment welding equipment;

SECTION D.2

FACILITY OPERATION CONDITIONS

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- (b) three (3) storage tanks consisting of:
 - (1) one (1) 40,000 gallon capacity asphalt tank #1 rated at 200 gallons per minute and identified as EU 2.1, with a fiber filter bed to control particulate matter, exhausting at one (1) stack identified as 71;
 - one (1) 10,000 gallon capacity adhesive tank #7, currently out of service to be placed back in service, rated at 200 gallons per minute and identified as EU 2.2, with particulate matter to be controlled by fiber bed filter and exhausting to one (1) unlabeled stack; and
 - (3) one (1) 10,000 gallon capacity adhesive tank #7A, to be built, rated at 200 gallons per minute and identified as EU 2.3, with particulate matter to be controlled by fiber bed filter and exhausting to one (1) unlabeled stack.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)
 - (a) Pursuant to 326 IAC 12 (40 CFR part 60.110b Subpart Kb Standards of Performance for Volatile Organic Compound Storage Vessels), records of the dimensions and capacity of asphalt tank #1 shall be maintained for the life of the facility to document that the capacity of this tank is greater than 75 m³ and less than 151 m³ (e.g. 147 m³). To comply with this regulation, the maximum true vapor pressure (TVP) of the materials stored shall be less than 15 kPa (2.176 psia) at the temperature stored.
 - (b) The combined throughput for asphalt tank #1 in Section D.2 and tank #2 in Section D.3 are limited to 28,502,000 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 2,375,200 gallons per month.
 - (c) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the asphalt storage tank #1 (EU 2.1) visible emissions shall be limited to zero (0) percent.
 - (d) The throughput for each adhesive tank 7 and 7A is limited to 1,295,640 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 107,970 gallons per month for each tank.

This operating condition will limit total volatile organic compounds (VOC) emissions from the four tanks including tank #1, tank #2, tank 7 and tank 7A to 7.72 tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM_{10} emissions to 1.13 tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

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D.2.2 Pressure Readings

The Permittee shall take readings of the total static pressure drop across each tank's fiber filter bed controlling this operation, at least once per week when the tanks are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each fiber filter bed shall be maintained within the range of 0.25 and 10 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.3 Filter Bed Inspections

An inspection shall be performed each calendar quarter of each tank's fiber filter bed. Al defective filters shall be replaced.

D.2.4 Daily Visible Emission Observations

Daily visible emission notations of the tank stack exhaust shall be performed during normal daylight operations. A trained employee shall record yes or no whether emissions are observed. The yes means visible emissions are observed and the no means that visible emissions are not observed. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.5 Operational parameters

- (a) The Permittee shall maintain weekly records at the stationary source of the following:
 - (1) inlet and outlet differential static pressure;
 - (2) cleaning cycle: frequency and differential pressure;
 - (3) fan speed/current and flow rate;
- (b) The Permittee shall maintain daily records at the stationary source of the following:
 - (1) daily visible emission observations;
 - (2) checklist with dates and initials for each preventive action performed; and
 - (3) records of corrective actions.

D.2.5 <u>Throughput of Materials</u>

The Permittee shall maintain records at the source of the throughput for each tank. The records shall be complete and sufficient to establish compliance with the throughput limits and/or VOC, particulate matter and PM_{10} emission limits established in this permit. The records shall contain a minimum of the following:

- (a) the throughput of material through each tank for each month;
- (b) the 12 month rolling total throughput of materials through each tank;
- (c) the types of liquid stored;

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(c) one (1) 30,000 gallon capacity asphalt tank #2 rated at 200 gallons per minute and identified as EU 3.1, exhausting at one (1) stack identified as 72.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)

The combined throughput for asphalt tank #2 in Section D.3 and tank #1 in Section D.2 are limited to 28,502,000 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the throughput shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 2,375,200 gallons per month.

This operating limit shall limit total volatile organic compounds (VOC) emissions from the tanks including tank #1 and tank #2 to 7.14 tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM10 emissions from the tank to 2.02 tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.3.2 Daily Visible Emissions Observations

Daily visible emission notations of the tank stack exhaust shall be performed during normal daylight operations. A trained employee shall record yes or no whether emissions are observed. The yes means visible emissions are observed and the no means that visible emissions are not observed. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when abnormal emission is observed. Pursuant to 326 IAC 5-1-2 (1), visible emissions shall meet the following limitations:

- visible emissions shall not exceed an average of forty percent (40%) opacity in twentyfour (24) consecutive readings; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six hour period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.3 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) daily visible emission observations;
- (b) checklist with dates and initials for each preventive action performed; and
- (c) records of corrective actions.

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Facility Description [326 IAC 2-8-4(10)]:

- (d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:
 - (1) one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, utilizing "Smartimers" for controlling cleaning cycle frequency, each exhausting at one (1) individual stack identified as 74 and 75:
 - one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 77;
 - one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 utilizing "Smartimers" for controlling cleaning cycle frequency, particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81;
 - one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79;
 - one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A;
 - one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, utilizing "Smartimers" for controlling cleaning cycle frequency, particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
 - one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C;
 - (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse associated with the permitted mineral surfacing processes, exhausting at one (1) stack; and
 - (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM and PM₁₀)

This operating condition imposes no limitation below the potential to emit for total particulate matter and PM_{10} emissions from the nine (9) storage vessels controlled by the twelve (12) baghouses. The potential emissions from these baghouses are 1.03 pounds per hour. At this emission rate in conjunction with the other operating conditions stated elsewhere in the permit, total source particulate matter and PM_{10} emissions are limited to less than 100 tons per year, therefore, the requirements of 326 IAC 2-7 do not apply.

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Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.2 Pressure Readings

The Permittee shall take readings of the total static pressure drop across each baghouse exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse exhaust shall be maintained within the range of 0.25 and 8 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall be subject to approval by IDEM, OAM, but shall not be subject to calibration at least once every six (6) months.

D.4.3 <u>Daily Visible Emission Observations</u>

- (a) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the raw material silos (EU 4.1 through 4.11) visible emissions shall be limited to 1 percent.
- (b) Daily visible emission notations of each baghouse stack exhaust shall be performed during normal daylight operations. A trained employee shall record yes or no whether emissions are observed. The yes means visible emissions are observed and the no means that visible emissions are not observed. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.4.4 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers";
- (c) daily visible emission observations;
- (d) checklist with dates and initials for each preventive action performed;
- (e) records of corrective actions; and
- (f) during periods of inclement weather a log must be kept of dates when readings are not taken.

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D.4.5 Reporting of Deviations

Any deviations of operational parameters noted in the records kept pursuant to Condition D.4.3 shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted in accordance with Condition B.12.

D.4.6 Quarterly Reporting

A quarterly summary to document compliance with section shall be submitted, to the address listed in Section C.15 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

D.4.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for each baghouse at this facility.

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SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36:
 - one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons granules and sand per day, exhausting through one stack identified as 71A;
 - (4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14;
 - one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
 - (6) fugitive emissions from ventilators, identified as ID# 93.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)

The production of asphalt intermediates and final products through each facility is limited to 454,200 tons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual tons produced in the previous eleven (11) months. Compliance is based on the total tons produced during the previous 12 months. During the first 12 months of operation under this permit, the production shall be limited such that the total production in tons divided by the accumulated months of operation shall not exceed 37,850 tons per month.

- (a) EU 4.9
 - This operating limit will limit total particulate matter and PM_{10} emissions from EU 4.9 to 0.39 tons per twelve (12) month period rolled on a monthly basis.
- (b) EU 6.1
 - (i) The operating limit established by this condition and the use of the fiber bed filter will limit total particulate matter and PM10 emissions from EU 6.1 to 1.61 tons per twelve (12) month period rolled on a monthly basis and total VOC emissions from EU 6.1 to 20.7 tons per twelve (12) month period rolled on a monthly basis.
 - (ii) Pursuant to 326 IAC 6-3-2 (Process Operations) the asphalt coater and coating surge tank particulate matter emissions shall not exceed 44.9 pounds per hour. The operating limit established by this condition will ensure compliance by limited emissions to below the state allowable emissions rate of 196.66 tons per year.

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- (iii) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the asphalt coater and coating surge tank particulate matter emissions shall not exceed 0.04 kilograms per megagram of asphalt shingle or mineral-surfaced roll roofing produced. The operating limit established by this condition will ensure compliance by limited emissions to below the NSPS allowable emissions of 18.17 tons per year.
- (iv) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the asphalt coater and coating surge tank exhaust gas opacity shall not exceed 20 percent and any visible emissions from the asphalt coater and coating surge tank exhaust capture system shall not exceed 20 percent for any consecutive 60 minute period of valid observations.

(c) EU 7.1

This operating limit shall limit total particulate matter and PM_{10} emissions from EU 7.1 to 5.9 tons per twelve (12) month period rolled on a monthly basis and total VOC emissions from EU 7.1 to 0.68 tons per twelve (12) month period rolled on a monthly basis.

(d) EU 7.2

This operating limit shall limit total particulate matter and PM_{10} emissions from EU 7.2 to 61.3 tons per twelve (12) month period rolled on a monthly basis and total VOC emissions from EU 7.2 to 7.95 tons per twelve (12) month period rolled on a monthly basis.

(e) ID# 93

This operating limit shall limit total particulate matter and PM_{10} emissions from ID# 93 to 8.10 tons per twelve (12) month period rolled on a monthly basis and total VOC emissions from ID# 93 to 22.09 tons per twelve (12) month period rolled on a monthly basis.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Testing [326 IAC 2-8-4(3)]

D.6.2 Testing Requirements

Compliance testing shall be conducted (pursuant to Condition C.6 Performance Testing) on the asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, the material surfacing applicator cooling section identified as EU 7.2, and the ventilators, identified as ID# 93 for PM, PM-10 and VOC within thirty-six (36) to forty-eight (48) months of issuing this FESOP. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol shall be submitted to the address listed in Condition C.6 at least thirty-five (35) days before the intended test date. [326 IAC 3-2.1-2(a)]

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Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.6.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across the EU 7.1 baghouse exhaust and the EU 6.1 fiber bed filter exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the EU 7.1 baghouse exhaust shall be maintained within the range of 0.25 and 10 inches of water or a range established during the latest stack test and the EU 6.1 fiber bed filter exhaust shall be maintained within the range of 4 and 12 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall be subject to approval by IDEM, OAM, but shall not be subject to calibration at least once every six (6) months.

D.6.4 Daily Visible Emission Observations

Daily visible emission notations of the EU 6.1 coater and coating surge tank exhaust stack, the EU 7.1 baghouse stack exhaust, the EU 7.2 stack exhaust and the ID# 93 ventilators exhaust shall be performed during normal daylight operations. A trained employee shall record yes or no whether emissions are observed. The yes means visible emissions are observed and the no means that visible emissions are not observed. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when abnormal emission is observed.

Pursuant to 326 IAC 5-1-2 (1), visible emissions shall meet the following limitations:

- (a) visible emissions shall not exceed an average of forty percent (40%) opacity in twentyfour (24) consecutive readings; and
- (b) visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes in a six hour period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.6.5 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers":

First Significant Permit Revision: 047-11198 Modified by: PR/EVP Page 38a of 47 FESOP No. F047-5160-00005

- (c) daily visible emission observations;
- (d) checklist with dates and initials for each preventive action performed;
- (e) records of corrective actions; and
- (f) during periods of inclement weather a log must be kept of dates when readings are not taken.

D.6.6 Reporting of Deviations

Any deviations of operational parameters noted in the records kept pursuant to Condition D.6.5 shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted in accordance with Condition B.12. Reporting in accordance with Condition D.6.2 shall be submitted in accordance with 326 IAC 3-2.1.

D.6.7 Quarterly Reporting

A quarterly summary to document compliance with operation condition number D.6.1 shall be submitted, to the address listed in Section C.15 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

Mr. Michael P. Friderichs Owens Corning 128 W. Eighth Street Brookville, Indiana, 47012

Re: **047-11198**

First Significant Revision to **FESOP 047-5160-00005**

Dear Mr. Friderichs:

Owens Corning was issued a permit on October 22, 1997, for an asphalt felt, coatings, and roofing products production plant. A letter requesting changes to this permit was received on July 27, 1999. Pursuant to the provisions of 326 IAC 2-8-11.1(g) a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

(a) Section D.4.4(c) requires fan performance to be measured on a daily basis. Readings include rotational speed, drive motor current, and airflow rate.

If a dust collector exhaust fan is not running the differential pressure will increase. This is caused by the air being forced through the bags instead of being drawn through by the fan. Owens Corning requests that the daily fan performance measurements be removed from the permit since visible emission and differential pressure readings are being recorded. Owens Corning requests that if this condition must remain in their permit that it be modified to a one time reading and reread if the fan or related equipment is modified. Daily readings are too labor intensive since the fans are on top of silos and in remote locations.

(b) Section D.4.4(b) requires that daily readings of cleaning cycle including frequency and differential pressure be maintained.

"Smartimers" are used on several dust collectors at the facility, making the cleaning cycle frequency irregular. Differential pressure will continue to be monitored daily. "Smartimers" are factory calibrated and no field calibration is required. Owens Corning requests that the calibration requirements be removed from the dust collectors equipped with "Smartimers." However, Owens Corning requests that the frequency of the cleaning cycle be recorded once for those dust collectors that do not have "Smartimers" and record each time an adjustment is made. Owens Corning requests that for the dust collectors with "Smartimers" the cleaning cycle frequency requirement be removed from the permit. "Smartimers" are on the following dust collectors:

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Silo #1, EU 4.1, stacks 74 & 75 Silo #2, EU 4.2, stack 77 Silo #3, EU 4.4, stack 79 Silo #4, EU 4.3, stacks 80 & 81 Filler Upper Surge Hopper, EU 4.7, stacks 15A & 15B Filler Lower Surge Hopper, EU 4.8, stack 15C Material Surfacing Applicator, EU 7.1, stack 14 Mat/Granule Dust Collector

(c) The permit states a differential pressure range of 0.25" w.c. to 4"w.c. for dust collectors (Section D.4.2) and fiber bed filters (Section D.6.3).

Per the manufacturers' updated recommendations, Owens Corning requests that the ranges be changed:

dust collector limits: 0.25" w.c. to 8" w.c., and Fiber bed filter limits: 0.25" w.c. to 10"w.c.

(d) Section D.5 of the permit is for the coater mixer.

The mixer is a closed system. It does not have a stack. Owens Corning requests that the daily visible emission observation requirement be removed from the permit. Since this is a closed system, it is also requested that the throughput monitoring listed in D.5.4 be removed from the permit.

- (e) Section D.2.1(b) limits the throughput for asphalt tank #1 to 14,251,000 gallons per twelve consecutive months. Section D.3.1 limits the throughput for asphalt tank #2 to the same limit as tank #1. Owens Corning uses tank #1 in its process. Tank #2 is used for back-up purposes only. It is to be used only if tank #1 is out of commission. The original application split the annual asphalt consumption evenly between the two tanks. This is how the permit is currently written. Owens Corning requests that tank #1 be permitted for the total annual throughput of 28,502,000 gallons by modifying Section D.2(b). This tank has a control device and tank #2 does not. Therefore, the potential emissions will be lower if all asphalt is processed through tank #1. Owens Corning also requests that the throughput listed for tank #2 remains as is, but to add the limitation of only operating tank #1 or tank #2 at any one time. This will ensure that the emission limitations originally permitted will not be exceeded.
- (f) A fiber bed filter air pollution control device will be added to the coater hood exhaust, Stack 36. This will reduce PM and VOC emissions. The pressure drop range across this filter will be 4 to 12 inches of water columns.
- A granule sand reclaim system has been installed. This system was installed to separate sand and granules from the process cooling water and recycle it back into the process for re-use. The emissions from this source will be 0.002 tons per year for PM and PM10. It is exempt from permitting requirements. The PM and PM10 emissions from the separator will be reduced by 90% due to the sand reclaim system being installed. This represents a reduction from 16.1 tons of PM and PM10 per year to 1.61 tons per year. This will provide an adequate cushion of PM/PM10 emissions in order to stay below the FESOP threshold. The source will be operated 24 hours per day, 7 days per week, 52 weeks per year. This system will process a maximum of 4 tons per day. This unit was installed in January 1999. It is vented outside the building. The stack is 5 inches in diameter, 9 feet high, with a flow rate of 370 cfm at a temperature of 157EF. The system is manufactured by Martin, and the model number is Screw Conveyor, 6" diameter x 6' long.

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There are no combustion sources or pollution control devices associated with this equipment. It only emits PM/PM10 at a rate of 0.0006 pounds per hour and 0.002 tons per year.

- (h) The dust collector on the Surfacing Material Silo #7, EU 4.10, stack 89 (Section D.4 of permit) will be removed. The source will be vented through the existing dust collector defined in Section A.3(d)(28) of the permit.
- (i) The dust collector on the Surfacing Material Receiving Bin, EU 4.11, stack 90 (Section D.4 of permit) will be removed. The source will be vented through the existing dust collector associated with the Material Surfacing Applicator, EU 7.1, stack 14.

Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows (changes indicated in **bold face** or strikeout):

Section A.1 of the permit has been revised as follows:

Responsible Official: Michael P. Friderichs Martin D. Bever

The changes to Section A.2 are as follows:

- (d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:
 - (1) one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, utilizing "Smartimers" for controlling cleaning cycle frequency, with each exhausting at one (1) individual stack identified as 74 and 75;
 - one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, **utilizing**"Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 77:
 - (3) one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 **utilizing "Smartimers" for controlling cleaning cycle frequency**, with particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81;
 - (4) one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79;
 - one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A;
 - one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, **utilizing "Smartimers" for controlling cleaning cycle frequency, with** particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
 - (7) one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C;

- (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse associated with the permitted mineral surfacing processes, exhausting at one (1) stack identified as 89; and
- (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 9014.
- (e) one (1) asphalt filler mixer rated at 300 gallons per minute and identified as EU 5.1;
- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - (2) one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36:
 - (3) one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons granules and sand per day, exhausting through one stack identified as 71A.
 - (3)(4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14;
 - (4)(5) one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
 - (5)(6) fugitive emissions from ventilators, identified as ID# 93.

The changes to Condition D.2.1(b) are as follows:

- (b) The **combined** throughput for asphalt tank #1 **in Section D.2 and tank #2 in Section D.3** is are limited to 14,251,200 28,502,000 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 1,187,600 2,375,200 gallons per month.
- (c) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the asphalt storage tank #1 (EU 2.1) visible emissions shall be limited to zero (0) percent.

(d) The throughput for each adhesive tank 7 and 7A is limited to 1,295,640 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 107,970 gallons per month for each tank.

This operating condition will limit total volatile organic compounds (VOC) emissions from the threefour tanks including tank #1, tank #2, tank 7 and tank 7A to $\frac{4.15}{7.72}$ tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM₁₀ emissions to $\frac{0.12}{1.13}$ tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

Condition D.2.2, Pressure Readings, has been revised as follows:

The Permittee shall take readings of the total static pressure drop across each tank's fiber filter bed controlling this operation, at least once per day when the tanks are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each fiber filter bed shall be maintained within the range of 0.25 and **410** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The changes to Condition D.3.1 are as follows:

D.3.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)
The combined throughput for asphalt tank #2 in Section D.3 and tank #1 in Section D.2 is are limited to 44,251,200 28,502,000 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the throughput shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 1,187,600 2,375,200 gallons per month.

This operating limit shall limit total volatile organic compounds (VOC) emissions from the tank**s including tank #1 and tank #2** to 3.57 **7.14** tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM₁₀ emissions from the tank to 4.01 **2.02** tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

The changes to Section D.4 are as follows:

Facility Description [326 IAC 2-8-4(10)]:

- (d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:
 - (1) one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, **utilizing "Smartimers" for controlling cleaning cycle frequency**, with each exhausting at one (1) individual stack identified as 74 and 75:
 - one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, **utilizing "Smartimers" for controlling cleaning cycle frequency**, exhausting at one (1) stack identified as 77;
 - one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 utilizing "Smartimers" for controlling cleaning cycle frequency, with particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81:
 - (4) one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79;
 - (5) one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A;
 - one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, **utilizing "Smartimers" for controlling cleaning cycle frequency, with** particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
 - one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, **utilizing**"Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C:
 - (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse **associated with the permitted mineral surfacing processes**, exhausting at one (1) stack identified as 89; and
 - (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 9014.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.2 <u>Pressure Readings</u>

The Permittee shall take readings of the total static pressure drop across each baghouse exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse exhaust shall be maintained within the range of 0.25 and 48 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall not be subject to calibration at least once every six (6) months.

D.4.4 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers";
- (c) fan speed/current and flow rate;
- (d)(c) daily visible emission observations;
- (e)(d) checklist with dates and initials for each preventive action performed;
- (f)(e) records of corrective actions; and
- (g)(f) during periods of inclement weather a log must be kept of dates when readings are not taken.

The changes to Condition D.6 are as follows:

Facility Description [326 IAC 2-8-4(10)]:

- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36:
 - (3) one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons granules and sand per day, exhausting through one stack identified as 71A.
 - (3)(4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14:
 - (4)(5) one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
 - (5)(6) fugitive emissions from ventilators, identified as ID# 93.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

- D.6.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)

 The production of asphalt intermediates and final products through each facility is limited to 454,200 tons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual tons produced in the previous eleven (11) months. Compliance is based on the total tons produced during the previous 12 months. During the first 12 months of operation under this permit, the production shall be limited such that the total production in tons divided by the accumulated months of operation shall not exceed 37,850 tons per month.
 - (a) EU 4.9
 This operating limit will limit total particulate matter and PM₁₀ emissions from EU 4.9 to 0.39 tons per twelve (12) month period rolled on a monthly basis.
 - (b) EU 6.1
 - (i) The operating limit established by this condition **and the use of the fiber bed filter** will limit total particulate matter and PM₁₀ emissions from
 EU 6.1 to 16.1**1.61** tons per twelve (12) month period rolled on a
 monthly basis and total VOC emissions from EU 6.1 to 20.7 tons per
 twelve (12) month period rolled on a monthly basis.

D.6.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across the EU 7.1 baghouse exhaust and the EU 6.1 fiber bed filter exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the EU 7.1 baghouse exhaust shall be maintained within the range of 0.25 and 4-10 inches of water or a range established during the latest stack test and the EU 6.1 fiber bed filter exhaust shall be maintained within the range of 4 and 12 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall be subject to approval by IDEM, OAM, but shall not be subject to calibration at least once every six (6) months.

D.6.5 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers";
- (c) fan speed/current and flow rate;
- (d)(c) daily visible emission observations;
- (e)(d) checklist with dates and initials for each preventive action performed;
- (f)(e) records of corrective actions; and
- (g)(f) during periods of inclement weather a log must be kept of dates when readings are not taken.

The source requested that the visible emission notations requirements for the mixer be removed, however, exhausting into the building does not assure that no PM will be emitted to the atmosphere. If noticeable particulate matter were to be emitted from a emission unit, the employees working in that area would be reasonably expected to open doors or windows to allow the room to clear. If the mixer exhaust is not vented to the atmosphere, daily visible emissions are not required as stated. Therefore, inspections are at the discretion of the source when the woodworking operations do not exhaust to the atmosphere.

The source also requested that the frequency of the cleaning cycle be recorded once for those dust collectors that do not have "Smartimers" and record again each time an adjustment is made. However, daily records of the cleaning cycle are among those parametric monitoring requirements necessary to show that the baghouses or dust collectors are operating properly. As the "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) automatically control the cleaning cycle on an as needed (irregular) basis, cleaning cycle frequency record keeping for those units may not provide any useful information. However, those baghouses operating without the "Smartimers" do require record keeping of their cleaning cycle frequency as the information can be used, for instance, to determine how effectively the bags are operating and whether or not any repair or replacements steps must be taken. Therefore, the condition has not been changed. The use and monitoring of the baghouses is necessary to ensure that the facility is operating correctly and that the ambient air quality standards set forth in 326 IAC 1-3 will be attained and/or maintained, and that the public health will be protected, as allowed by 326 IAC 2-1-5(a)(2).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz at (973) 575-2555, extension 3241 or call (800) 451-6027, press 0 and ask for extension (3-6878).

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

Attachments PR/EVP

cc: File - Franklin County U.S. EPA, Region V

Franklin County Health Department

Air Compliance Section Inspector - Warren Greiling

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley Technical Support and Modeling - Nancy Landau

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision for a Federally Enforceable State Operating Permit

Source Background and Description

Source Name: Owens Corning

Source Location: 128 W. Eighth Street, Brookville, IN 47012

County: Franklin SIC Code: 2952

Operation Permit No.: F047-5160-00005
Operation Permit Issuance Date: October 22, 1997
Permit Revision No.: 047-11198-00005
Permit Reviewer: Phillip Ritz/EVP

History

On July 27, 1999, Owens Corning submitted an application to the OAM requesting to add additional surface coating lines to their existing plant. Owens Corning was issued a Federally Enforceable State Operating Permit on October 22, 1997. This source is modifying the two tanks identified as Tanks 1 and 2 because they are undergoing a change in the method of operation of any existing emissions unit that increases the potential to emit of any regulated pollutant that could be emitted from the emissions unit, or that results in emissions of any regulated pollutant not previously emitted. The potential emissions, taking into account limitations by enforceable permit conditions, from each facility are increasing as a result of the emissions cap changes on Tanks 1 and 2. The units are being modified since there is a change in the method of operation which increases the potential or legally allowed emissions (whichever is more stringent) of any regulated pollutant that could be emitted from the facility.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 27, 1999.

Owens-Corning Page 2 of 10 Brookville, Indiana Significant Permit Revision: 047-11198-00005

Permit Reviewer: PR/EVP

Emission Calculations

No emission units are being constructed with this modification, therefore emission calculations are not required.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)				
PM	2.16				
PM-10	2.16				
SO ₂	0.52				
VOC	13.50				
СО	2.04				
NO _x	0.00				

Note: Both Tank 1 and tank 2 are assumed to each operate at 24 million gallons per year, double the throughput used to determine the limited potential to emit for these units in FESOP 047-5160-00005.

Justification for Modification

The Federally Enforceable State Operating Permit is being modified through a Significant Permit Revision for a Federally Enforceable State Operating Permit. This modification is being performed pursuant to 326 IAC 2.8-11.1(g).

County Attainment Status

The source is located in Franklin County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO_2	attainment
Ozone	attainment
СО	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Franklin County has been designated as attainment or unclassifiable for ozone.

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Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)			
PM	99.10			
PM-10	99.10			
SO ₂	10.11			
VOC	65.07			
СО	5.27			
NOx	5.72			

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Limited Potential to Emit table in the Technical Support Document for the Federally Enforceable State Operating Permit issued on October 22, 1997.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
asphalt tanks #1 (EU 3.1) and #2 (EU 3.1)	2.02	2.02	0.52	7.14	2.01	0.00	0.00
Total Emissions	2.02	2.02	0.52	7.14	2.01	0.00	0.00

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

There are no new Federal Rules applicable on a source-wide basis due to this Significant Permit Revision. All Federal Rules cited in Federally Enforceable State Operating Permit (F047-5160-00005), issued on October 22, 1997, continue to apply to this source.

State Rule Applicability - Entire Source

There are no new State Rules applicable on a source-wide basis due to this Significant Permit Revision. All source-wide State Rules cited in Federally Enforceable State Operating Permit

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(F047-5160-00005), issued on October 22, 1997, continue to apply to this source.

State Rule Applicability - Individual Facilities

There are no new State Rules applicable on a individual basis due to this Significant Permit Revision. All individual facilities State Rules cited in Federally Enforceable State Operating Permit (F047-5160-00005), issued on October 22, 1997, continue to apply to this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this modification.

Changes Proposed

The following changes have been made to the Federally Enforceable State Operating Permit (F047-5160-00005):

The changes to Section A.2 are as follows:

- (d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:
 - (1) one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, utilizing "Smartimers" for controlling cleaning cycle frequency, with each exhausting at one (1) individual stack identified as 74 and 75;
 - one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, **utilizing**"Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 77:
 - one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 utilizing "Smartimers" for controlling cleaning cycle frequency, with

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particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81;

- (4) one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79;
- one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, exhausting at one (1) stack identified as 14A;
- (6) one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, utilizing "Smartimers" for controlling cleaning cycle frequency, with particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
- (7) one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C;
- (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse associated with the permitted mineral surfacing processes, exhausting at one (1) stack identified as 89; and
- (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, **utilizing "Smartimers" for controlling cleaning cycle frequency**, exhausting at one (1) stack identified as 9014.
- (e) one (1) asphalt filler mixer rated at 300 gallons per minute and identified as EU 5.1;
- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36;
 - (3) one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons of sand and granule per day, exhausting through one stack identified as 37,
 - (3)(4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14;
 - (4)(5) one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
 - (5)(6) fugitive emissions from ventilators, identified as ID# 93.

The changes to Condition D.2.1(b) are as follows:

- (b) The **combined** throughput for asphalt tank #1 **in Section D.2** and tank #2 **in Section D.3** is are limited to \(\frac{14,251,200}{28,502,000} \) gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed \(\frac{1,187,600}{2,375,200} \) gallons per month.
- (c) Pursuant to 326 IAC 12 (40 CFR part 60.470, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture), the asphalt storage tank #1 (EU 2.1) visible emissions shall be limited to zero (0) percent.
- (d) The throughput for each adhesive tank 7 and 7A is limited to 1,295,640 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the sum of the throughputs shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 107,970 gallons per month for each tank.

This operating condition will limit total volatile organic compounds (VOC) emissions from the threefour tanks including tank #1, tank #2, tank 7 and tank 7A to $\frac{4.15}{7.72}$ tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM₁₀ emissions to $\frac{0.12}{1.13}$ tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

The changes to Condition D.3.1 are as follows:

D.3.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)
The combined throughput for asphalt tank #2 in Section D.3 and tank #1 in Section D.2-is are limited to 14,251,200 28,502,000 gallons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual gallons used in the previous eleven (11) months. Compliance is based on the total gallons used during the previous 12 months. During the first 12 months of operation under this permit, the throughput shall be limited such that the total gallons divided by the accumulated months of operation shall not exceed 1,187,600 2,375,200 gallons per month.

This operating limit shall limit total volatile organic compounds (VOC) emissions from the tank**s including tank #1 and tank #2** to 3.57 **7.14** tons per twelve (12) month period rolled on a monthly basis and shall limit total particulate matter and PM₁₀ emissions from the tank to 1.01 **2.02** tons per twelve (12) month period rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

The changes to Section D.4 are as follows:

Facility Description [326 IAC 2-8-4(10)]:

- (d) nine (9) storage vessels controlled by twelve (12) baghouses consisting of:
 - one (1) filler silo #1 rated at 64.2 thousand cubic feet per hour and identified as EU 4.1 with particulate matter controlled by two (2) baghouses, **utilizing "Smartimers" for controlling cleaning cycle frequency**, with each exhausting at one (1) individual stack identified as 74 and 75;
 - one (1) filler silo #2 rated at 32.1 thousand cubic feet per hour and identified as EU 4.2, with particulate matter controlled by one (1) baghouse, **utilizing "Smartimers" for controlling cleaning cycle frequency**, exhausting at one (1) stack identified as 77:
 - (3) one (1) filler silo #4 rated at 64.2 thousand cubic feet per hour and identified as EU 4.3 **utilizing "Smartimers" for controlling cleaning cycle frequency**, with particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 80 and 81;
 - (4) one (1) parting agent silo #3 rated at 32.1 thousand cubic feet per hour and identified as EU 4.4, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 79:
 - one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, exhausting at one (1) stack identified as 14A;
 - one (1) filler upper surge hopper rated at 54 thousand cubic feet per hour and identified as EU 4.7, **utilizing "Smartimers" for controlling cleaning cycle**frequency, with particulate matter controlled by two (2) baghouses with each exhausting at one (1) individual stack identified as 15A and 15B;
 - (7) one (1) filler lower surge hopper rated at 27 thousand cubic feet per hour and identified as EU 4.8, with particulate matter controlled by one (1) baghouse, **utilizing** "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 15C;
 - (8) one (1) surfacing material silo #7 rated at 30 thousand cubic feet per hour and identified as EU 4.10, with particulate matter controlled by one (1) baghouse associated with the permitted mineral surfacing processes, exhausting at one (1) stack identified as 89; and
 - (9) one (1) surfacing material receiving bin rated at 30 thousand cubic feet per hour and identified as EU 4.11, with particulate matter controlled by one (1) baghouse, **utilizing** "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 9014.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.4.2 Pressure Readings

The Permittee shall take readings of the total static pressure drop across each baghouse exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse exhaust shall be maintained within the range of 0.25 and 48 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall not be subject to calibration at least once every six (6) months.

D.4.4 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers";
- (c) fan speed/current and flow rate;
- (d)(c) daily visible emission observations;
- (e)(d) checklist with dates and initials for each preventive action performed;
- (f)(e) records of corrective actions; and
- (g)(f) during periods of inclement weather a log must be kept of dates when readings are not taken.

The changes to Condition D.6 are as follows:

Facility Description [326 IAC 2-8-4(10)]:

- (f) five (5) facilities with limited production rates consisting of:
 - (1) six (6) surfacing material silos #1 6 identified as EU 4.9, all exhausting at one (1) stack identified as 20;
 - one (1) asphalt coater (coating rolls) and coating surge tank identified as EU 6.1, with particulate matter controlled by one (1) fiber bed filter, exhausting at one stack identified as 36:
 - one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons of sand and granule per day, exhausting through one stack identified as 37:
 - (3)(4) one (1) material surfacing applicator (material surfacing area) rated at 471 thousand cubic feet per hour and identified as EU 7.1, with particulate matter controlled by one (1) baghouse utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one stack identified as 14;
 - (4)(5) one (1) cooling section identified as EU 7.2, exhausting at two (2) stacks identified as 41 and 42; and
 - (5)(6) fugitive emissions from ventilators, identified as ID# 93.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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D.6.1 Volatile Organic Compounds and particulate Matter (PM and PM₁₀)

The production of asphalt intermediates and final products through each facility is limited to 454,200 tons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual limit minus the sum of actual tons produced in the previous eleven (11) months. Compliance is based on the total tons produced during the previous 12 months. During the first 12 months of operation under this permit, the production shall be limited such that the total production in tons divided by the accumulated months of operation shall not exceed 37,850 tons per month.

- (a) EU 4.9
 - This operating limit will limit total particulate matter and PM₁₀ emissions from EU 4.9 to 0.39 tons per twelve (12) month period rolled on a monthly basis.
- EU 6.1 (b)
 - The operating limit established by this condition and the use of the (i) **fiber bed filter** will limit total particulate matter and PM₁₀ emissions from EU 6.1 to 16.11.61 tons per twelve (12) month period rolled on a monthly basis and total VOC emissions from EU 6.1 to 20.7 tons per twelve (12) month period rolled on a monthly basis.

D.6.3 Pressure Readings

The Permittee shall take readings of the total static pressure drop across the EU 7.1 baghouse exhaust and the EU 6.1 fiber bed filter exhaust controlling this operation, at least once per day when the process is in operation. During periods of inclement weather, these readings shall be performed as weather permits. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the EU 7.1 baghouse exhaust shall be maintained within the range of 0.25 and 4-10 inches of water or a range established during the latest stack test and the EU 6.1 fiber bed filter exhaust shall be maintained within the range of 4 and 12 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.10 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. Those baghouses utilizing "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) shall be subject to approval by IDEM, OAM, but shall not be subject to calibration at least once every six (6) months.

D.6.5 Operational parameters

The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure:
- cleaning cycle: frequency and differential pressure for those baghouses that do not (b) have "Smartimers";
- fan speed/current and flow rate; (c)
- daily visible emission observations; (d)

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(e) checklist with dates and initials for each preventive action performed; and

- (f) records of corrective actions; and
- (g) during periods of inclement weather a log must be kept of dates when readings are not taken.

The source requested that the visible emission notations requirements for the mixer be removed, however, exhausting into the building does not assure that no PM will be emitted to the atmosphere. If noticeable particulate matter were to be emitted from a emission unit, the employees working in that area would be reasonably expected to open doors or windows to allow the room to clear. If the mixer exhaust is not vented to the atmosphere, daily visible emissions are not required as stated. Therefore, inspections are at the discretion of the source when the woodworking operations do not exhaust to the atmosphere.

The source also requested that the frequency of the cleaning cycle be recorded once for those dust collectors that do not have "Smartimers" and record again each time an adjustment is made. However, daily records of the cleaning cycle are among those parametric monitoring requirements necessary to show that the baghouses or dust collectors are operating properly. As the "Smartimers" (factory-calibrated instruments used for determining the pressure drop of dust collectors which do not require field calibration) automatically control the cleaning cycle on an as needed (irregular) basis, cleaning cycle frequency record keeping for those units may not provide any useful information. However, those baghouses operating without the "Smartimers" do require record keeping of their cleaning cycle frequency as the information can be used, for instance, to determine how effectively the bags are operating and whether or not any repair or replacements steps must be taken. Therefore, the condition has not been changed. The use and monitoring of the baghouses is necessary to ensure that the facility is operating correctly and that the ambient air quality standards set forth in 326 IAC 1-3 will be attained and/or maintained, and that the public health will be protected, as allowed by 326 IAC 2-1-5(a)(2).

Conclusion

The operation of this modification to an asphalt felt, coatings, and roofing products production plant shall be subject to the conditions of the attached proposed **Permit Revision for a Federally Enforceable State Operating Permit No.** 047-11198-00005.

Indiana Department of Environmental Management Office of Air Management

Addendum to the

Technical Support Document for a Significant Permit Revision for a Federally Enforceable State Operating Permit

Source Name: Owens Corning

Source Location: 128 W. Eighth Street, Brookville, IN 47012

County: Franklin SIC Code: 2952

Operation Permit No.: F047-5160-00005
Operation Permit Issuance Date: October 22, 1997
Permit Revision No.: 047-11198-00005
Permit Reviewer: Phillip Ritz/EVP

On November 3, 1999, the Office of Air Management (OAM) had a notice published in the Brookville Democrat, Brookville, Indiana, stating that Owens Corning had applied for a Significant Permit Revision for a Federally Enforceable State Operating Permit to construct and operate a modification to their existing asphalt felt, coatings and roofing products production plant, with control. The notice also stated that OAM proposed to issue a Significant Permit Revision for a Federally Enforceable State Operating Permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision should be issued as proposed.

On November 23, 1999, Owens Corning submitted comments on the proposed Significant Permit Revision for a Federally Enforceable State Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1

Section A.1

States the "Responsible Official" for the facility as Michael P. Friderichs, The current "Responsible Official" for the Brookville Plant is Martin D. Bever.

Response 1

Section A.1 of the permit has been revised as follows:

Responsible Official: Michael P. Friderichs Martin D. Bever

Comment 2

Section A.2 (f), item (3), states: one (1) granule and said reclaim system, identified as EU 6.2, with a capacity of 4 tons of sand and granules per day, exhausting through one stack identified as 37.

This statement should read: one (1) granule and sand reclaim, system, identified as EU 6.2, with a capacity of 4 tons granules and sand per day, exhausting through one stack identified as 71 A.

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Response 2

Section A.2(f) of the permit has been revised as follows:

one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons of sand and granules and sand per day, exhausting through one stack identified as 37 71A;

Comment 3

Section D.2

Please check page number for the start of Section D.2, the revision lists it as page 25. My current permit states that Section D.2 starts at page 26.

Response 3

The permit has been revised to state that the page numbering for Section D.2 begins on page 26, and the remaining pages have also been renumbered.

Comment 4

Section D.2.2, States: each fiber bed filter shall be maintained within the range of 0.25 and 4 inches of water.

Our request was to have this changed to read: each Fiber bed filter shall be maintained within the range of 0.25 and 10 inches of water.

Response 4

Condition D.2.2, Pressure Readings, has been revised as follows:

The Permittee shall take readings of the total static pressure drop across each tank's fiber filter bed controlling this operation, at least once per day when the tanks are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each fiber filter bed shall be maintained within the range of 0.25 and **410** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

Comment 5

Section D.5, Our requested changes to this section are not listed in the revision. The mixer is a closed system and does not have a stack. Since the mixer does not have a stack, Section D.5.2 and Section D.5.4 do not apply to this Emission Unit.

Response 5

The source requested that the visible emission notations requirements for the mixer be removed, however, exhausting into the building does not assure that no PM will be emitted to the atmosphere. If noticeable particulate matter were to be emitted from a emission unit, the employees working in that area would be reasonably expected to open doors or windows to allow the room to clear. If the mixer exhaust is not vented to the atmosphere, daily visible emissions are not required as stated. Therefore, inspections are at the discretion of the source when the woodworking operations do not exhaust to the atmosphere.

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Comment 6

Section D.6 (f), item (3), states: one (1) granule and sand reclaim system, identified as EU 6.2, with a capacity of 4 tons of sand and granules per day, exhausting through one stack identified as 37. This statement should read: one (1) granule and sand reclaim system, identified as EU 6.2, with a capacity of 4 tons granule and sand per day, exhausting through one stack identified as 71 A.

Response 6

Condition D.6(f) has been revised as follows:

one (1) granule and sand reclaim system, identified as EU 6.2, with a maximum capacity of 4 tons of sand and granules and sand per day, exhausting through one stack identified as 37 71A:

Comment 7

Section D.6.5 (c), Item (c), fan speed/current and flow rate should be removed from the permit the same as it was in Section D.4.4.

Response 7

Condition D.6.5, Operational parameters, has been revised as follows: The Permittee shall maintain daily records at the stationary source of the following:

- (a) inlet and outlet differential static pressure;
- (b) cleaning cycle: frequency and differential pressure for those baghouses that do not have "Smartimers":
- (c) fan speed/current and flow rate;
- (d)(c) daily visible emission observations;
- (e)(d) checklist with dates and initials for each preventive action performed;
- (f)(e) records of corrective actions; and
- (g)(f) during periods of inclement weather a log must be kept of dates when readings are not taken.

Comment 8

Section A.2 (d), item (5), states: one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, exhausting at one (1) stack identified as 14A.

Stack 14A will be removed. This source will be vented through the existing dust Collector associated with the Material Surfacing Applicator, E.U. 7.1 identified as stack 14. There will be no change in emissions from this stack.

This statement should read: one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A.

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Response 8

Section A.2 (d), has been revised as follows:

one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, **utilizing "Smartimers"** for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A;

Comment 9

Section D.4 (d), item (5), states: one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, exhausting at one (1) stack identified as 14A.

Stack 14A will be removed. This source will be vented through the existing dust collector associated-d with the Material Surfacing Applicator, EU 7.1 identified as stack 14. There will be no change in emissions from this stack.

This statement should read: one (1) parting agent bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, utilizing "Smartimers" for controlling cleaning cycle frequency, exhausting at one (1) stack identified as 14A.

Response 9

Section D.4 (d), has been revised as follows:

one (1) parting agent use bin rated at 27 thousand cubic feet per hour and identified as EU 4.5, with particulate matter controlled by one (1) baghouse, **utilizing "Smartimers" for controlling cleaning cycle frequency**, exhausting at one (1) stack identified as 14A;